

THE EQUAL RIGHTS CENTER,	)	
	)	
	)	
Plaintiff,	)	
	)	Case No. 1:06-cv-01060-CCB
v.	)	
	)	
EQUITY RESIDENTIAL, <i>et al.</i> ,	)	
	)	
Defendants.	)	
	)	

Plaintiff The Equal Rights Center (“ERC”), by its counsel, respectfully moves this Court for an Order, substantively similar to the proposed Order attached hereto as Exhibit A, permitting the filing of the Plaintiff’s Revised Memorandum in Opposition to Defendants’ Motion for Partial Summary Judgment on Liability as to Twelve Properties to be filed under seal. The ERC makes this request pursuant to L.R. 104.13(c) and 105.11 and pursuant to this Court’s Stipulated Order Regarding Confidentiality of Discovery Material (Local Rule 104.13) dated October 10, 2007.

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**CERTIFICATE OF SERVICE**

I hereby certify that on October 8, 2014, I caused a true and correct copy of the foregoing to be served via the ECF filing system on all counsel of record, and that I have served opposing counsel via electronic mail copies of the documents filed under seal in Plaintiff's Opposition to Defendants' Motion for Partial Summary Judgment on Liability as to Twelve Properties.

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